

1 HEATHER E. WILLIAMS, SBN 122664
Federal Defender
2 HOOTAN BAIGMOHAMMADI, SBN 279105
Assistant Federal Defender
3 Designated Counsel for Service
801 I Street, Third Floor
4 Sacramento, CA 95814
T: (916) 498-5700
5 F: (916) 498-5710
6 Attorneys for Defendant
Mr. Correia
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:23-cr-00082-JAM
11 Plaintiff,)
12 vs.) **STIPULATION AND ORDER TO CONTINUE**
13) **STATUS HEARING AND EXCLUDE TIME**
AARON MICHAEL CORREIA,) Date: August 20, 2024
14 Defendant.) Time: 9:00 a.m.
15) Judge: John A. Mendez
_____)

16 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
17 Phillip A. Talbert, through Assistant United States Attorney Haddy Abouzeid, counsel for
18 Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan
19 Baigmohammadi, counsel for Defendant Aaron Correia, that the previously scheduled Status
20 Hearing set for August 20, 2024 be continued to September 17, 2024 at 9:00 a.m.

21 The parties specifically stipulate as follows:

- 22 1. By previous order, the Status Hearing is currently scheduled for August 20, 2024
23 at 9:00 a.m. Time has been ordered excluded through that date.
24 2. Mr. Correia respectfully requests that the Court continue the Status Hearing to
25 **September 17, 2024, at 9:00 a.m.**
26 3. The government has produced 101 pages and various audio recordings in
27 discovery. Mr. Correia requires additional time to review the discovery;
28

investigate and research possible defenses; research potential pretrial motions; explore potential resolutions to the case; and otherwise prepare for trial.

4. Mr. Correia believes that failure to grant his motion would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5. The government does not object to Mr. Correia's motion.
6. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between August 20, 2024 and September 17, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Correia in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: August 13, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Correia

Date: August 13, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Haddy Abouzeid
HADDY ABOUZEID
Assistant United States Attorney
Attorneys for Plaintiff

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

The Court, having received and considered the parties’ stipulation, and good cause appearing therefrom, **ADOPTS** the parties’ stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: August 14, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE